

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

# BEARBOX LLC AND AUSTIN STORMS

Plaintiffs,

V.

C.A. No. 21-534- GBW-CJB

LANCIUM LLC, MICHAEL T.

MCNAMARA, and RAYMOND E. CLINE, JR.

Defendants.

**DEFENDANTS' MOTION FOR BIFURCATION AND  
TO EXPEDITE BRIEFING AND CONSIDERATION OF THIS MOTION**

Defendants Lancium LLC, Michael T. McNamara, and Raymond E. Cline Jr., (“Defendants”) move to bifurcate the trial in this matter whereby the Court will first hold a bench trial on the claims of sole inventorship (Count I) and joint inventorship (Count II) followed by a jury trial on the conversion claim (Count V). The reasons for this motion are set forth in Defendants’ Opening Brief, filed herewith.

Because the pretrial conference is scheduled for November 22, 2022 and trial is set to begin on December 5, 2022, just weeks away, Defendants seek expedited consideration of this motion. Defendants' propose a briefing schedule where Bearbox LLC and Austin Storms ("Plaintiffs") answering brief is due on November 7, 2022 and Defendants' reply brief is due on November 11, 2022.

The Court may recall that Plaintiffs indicated they opposed bifurcation during the October 20, 2022 hearing. Oct. 20, 2022 Hr’g Tr. at 44:2-12 & 45:11-22. Defendants understand that Plaintiffs still oppose this motion.

Dated: October 31, 2022

BARNES & THORNBURG LLP

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